

North London Waste Plan to 2035

Hearing Statement

B Soundness

Main Matter 5 – Policy 2

Question 61



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The Pinkham Way Alliance

Representor No 36

Introduction

Response to Q61

3

This Hearing Statement is submitted on behalf of the Pinkham Way Alliance (PWA).

Pinkham Way Alliance is a community campaign group which came together in early 2011 when residents living in the surrounding area of the Pinkham Way site became concerned about plans by the North London Waste Authority (NLWA) to develop the site for a large scale MBT waste facility.

Since then, PWA has taken an active interest in and has participated in the preparation of the original Submission version of the North London Waste Plan, the Haringey Local Plan: Strategic Policies document and the Haringey Site Allocations DPD, having made representations to and appeared at the examinations in public of all those plans.

PWA has approximately 3000 supporters

Question 61

Is the methodology for identifying Schedule 2 and 3 Areas robust?

1 Response

- 1.1 We described the raft of factual errors in the Site Assessment on A22-HR at 9.12-9.56.¹
- 1.2 We mentioned Barnet's housing proposals at 9.49². Barnet's report on the NLWP to its December 11th 2018 Policy and Resources Committee stated that it had put forward its portion for waste use, adding: *As the landowner, LB Barnet will remain in control over its usage, subject to Haringey's planning policies.*³
- 1.3 Since May 2017, Barnet has been discussing housing proposals for its portion with Haringey. Both Councils have, by their approval of the NLWP for consultation with the whole site included, confirmed that it is deliverable. Their actions indicate the opposite. Barnet has also discussed its proposals with the NLWA, whose Reg 19 response nonetheless sustains the fiction of whole-site deliverability.
- 1.4 Question 24 in the Sites and Areas Assessment of the site mentions the congestion at the Colney Hatch Lane/A406 junction. Incredibly however it omits the chronic problem along the A406 itself, that is demonstrably amongst the worst in the UK,⁴ and results in regular saturation on the secondary (mainly B) network. We analyse it in the attached Appendix.⁵
- 1.5 In a desktop scoping report in 2009, Arups stated incorrectly that there was direct access from the A406 on to the site; the failed NLWP assessed the site on that basis. (The distance is in fact 1.2km)
- 1.6 At a NLWP Focus Group in June 2014, an Urbanvision consultant (who had worked on the Merseyside and Gtr Manchester Waste Plans) confirmed to PWA that, whilst a distance was not stipulated, he would normally advise 250m from the primary route network as a reasonable criterion.
- 1.7 The Councils' screening criterion is 2000m - 800% larger. We consider it embarrassingly site-specific.

¹NLWP – Reps received at Reg 19 (Representor order Aug 2019) pp 229-38.

²NLWP – Reps received at Reg 19 (Representor order Aug 2019) p 236.

³ Barnet, Policy & Resources Committee, Dec 18th 2018 - p 244, Section 1.41.

⁴ BBC News website, Feb 2019.

⁵PWA MM5 Q61 Appendix 1 – A406 congestion

MM5 Q 61 – Appendix 9

A406 Congestion & Local Consequences

PWA – NLWP MM5 Q61 – Appx 1 A406 & Local Congestion

Local residents are all too aware that, for a good part of most weekdays, the congestion along the A406 at Pinkham Way as it approaches the E Coast Main Line bridge and the junction with A109 Bounds Green Road can stretch back to the B550 Colney Hatch Lane (CHL) bridge (c 0.9m) and often to the slip road for the CHL/A406 junction (1.25m).

We note that the 'Highways Comments' in Q 24 of the Site Assessment for A22-HR Pinkham Way mentions congestion at the CHL / A406 junction 'at peak times'. In terms of timescale, this is a significant understatement.

More important though is the unacceptable omission of the chronic situation along the A406 itself. A recent BBC report indicated that the section from East Finchley (A1000) to Edmonton, which includes the Pinkham Way section, was the sixth most congested stretch of road in the UK.⁶ This commentary gives some details and sets out the consequences locally.

Implicit in the term 'Access to strategic road network', is the assumption that once there one will be able to move with reasonable ease. A route's simply being 'strategic' is insufficient. In our opinion, any argument put forward about 'waste miles' should, to give a realistic picture, factor in congestion, especially when it is chronic and so serious, and an assumed increase in 'waste miles equivalent' and emissions due to increased fuel consumption.

Until 2014 the DfT was publishing easily accessible figures on traffic flow (now no longer available in the same accessible format) on a) the stretch of the A406 between the A1000 and the A109 Bounds Green Road (red - east of the railway bridge), and b) the stretch from the junction running east from the junction with Bowes Road A1110 (red), where the A406 turns sharp right towards Green Lanes and eventually to Edmonton. The Streetmap below may help visualise the area.

⁶ <https://www.bbc.co.uk/news/uk-england-47175799>



In 2000 the daily flow along the A406 was c 47,000 vehicles, with some 44,000 continuing along the A406 to the next section. By 2015 the flow along section a) had risen to c 76,000 but for b) had risen to only 52,000. Thus by 2015 some 24,000 vehicles per day had left the A406 for other routes, compared with some 3,000 in 2000. For the most part they siphon off north and south up Colney Hatch Lane on to local roads.

At worst these local roads constitute a trident of gridlock, with the A406 (green) at the centre, Friern Barnet Road / Bowes Road (red) to the north, and Alexandra Park Road / Brownlow Road (B106 - orange) to the south, the two latter linked to the A406 by Colney Hatch Lane running south to north. Locals know that the traffic using these detours normally causes long tailbacks – that from Bounds Green Station back up towards the Alexandra Park Road / CLH junction, for instance, is regularly as long as 1.5km.

We note the Greater Manchester Site Appraisal Pro Forma Guidance of July 2008 (the year *after* the north London Councils began to draft the NLWP). It includes a comprehensive commentary on every criterion, and appears to try to set the ground for objective and well-founded site selection.

Criterion 20 asks: *'How suitable is the road network to accommodate the transportation of waste / products from resource recovery to and from the site?'*

It then sets out what factors the assessors are required to take into account: '*Record details of the nature / classification of the relevant roads and any potential problems (e.g. in terms of lack of road capacity or existing congestion)*'

At Section 3.4.16 on p 19, additional advice is given thus: '*Record details of the nature / classification of the relevant roads and any potential problems (e.g. in terms of lack of road capacity or existing congestion ... Note that when discussing the road hierarchy, reference should be made to the primary and secondary road network ...*' [our underlining].

This is a realistic and comprehensive basis for assessment, notably lacking in the NLWP.

PINKHAM WAY ALLIANCE

15th October 2019.